Exhibit 19 Quality Surveillance Plan October 2012

OFFICE OF HUMAN CAPITAL MANAGEMENT PROFESSIONAL AND ADMINISTRATIVE SUPPORT SERVICES NNG12XXXX QUALITY ASSURANCE SURVEILLANCE PLAN September 2012

1.0 INTRODUCTION

1.1 **Purpose**

This quality assurance plan (QASP) has been developed to provide NASA Goddard Space Flight Center (GSFC) an effective and systematic surveillance method to monitor contractor performance on NNG12XXXXX. The contract provides overarching professional and administrative human capital support services to help meet the vision and mission of the Office of Human Capital Management (OHCM) at Greenbelt.

1.2 Scope

This QASP has been developed to evaluate Contractor actions while implementing the Attachment A - Statement of Work SOW) of the above contract. It is designed to provide an effective surveillance method of monitoring Contractor performance on-site and in accordance with the SOW. The QASP provides a systematic method to evaluate the services the contractor is required to furnish. The Contractor, and not the Government, is responsible for management and quality control actions to meet the terms of the contract.

The role of government surveillance for quality assurance is to ensure contract standards and work requirements are achieved. The contractor is required to have a comprehensive program of inspections and monitoring actions. The first major step to ensuring a "self-correcting" contract is to ensure that the quality control program approved at the beginning of the contract provides the measures needed to ensure OHCM's requirements are met along with the contract terms and conditions. Once the quality control program is approved, careful application of the process and standards presented in the remainder of this document will ensure a robust quality assurance program.

2.0 **Surveillance Strategy and Approach**

2.1 Approach

The overall surveillance goal is to obtain objective and subjective evidence and data that enables the Government to determine whether the contractor's program and processes are functioning as intended in accordance with the terms of the contract. The focus of surveillance activities will be on prevention rather than detection, i.e., emphasizing controlled processes and methods of operation, as opposed to relying solely upon inspection and test of end items to identify problems.

Surveillance team members will interface directly with their contractor counterparts. They will document problems, concerns and issues, and take note of contractor accomplishments. They will collect performance metric data for trends, where applicable, and may participate in contractor review meetings. Information will flow from individual team members to the Contracting Officer's Representative (COR) or the Contracting Officer (CO), as applicable based on the type of information. Generally, technical performance information flows to the COR and business performance and contract compliance information flows to the CO.

2.2 **Surveillance Team**

Contract surveillance activities are ultimately the responsibility of the COR and CO. However, these two individuals rely on activities performed by a surveillance team to assure high quality contractor products and services. Surveillance team members regularly interact with the contractor and identify problems, concerns and issues. In addition, various members of the surveillance team will collect contractor performance data and report on contractor performance to the COR.

2.2.1 Task Monitors

Task Monitors (TMs) are the primary members of the surveillance team in that they have the most detailed knowledge of the projects/activities and the technical approach, and therefore have the most capability to monitor and review the contractor products and performance. TMs focus on individual projects/activities assessing and monitoring all areas that are necessary to assure product and service quality. As the TMs observe contractor performance problems or excellent performance, they bring these to the attention of the COR. The COR will document conversations with TMs.

2.3 SURVEILLANCE METHODS

The Government may use a variety of surveillance methods to evaluate the contractor's performance. The following forms of surveillance under this contract shall be utilized:

2.3.1 Communication

- Bi-Monthly Performance reviews
- Electronic mail
- Informal Discussions
- Other communication methods, as required

2.3.2 Evaluation and Reporting

- 533 Reports
- Review of customer feedback forms
- Monthly Contractor performance metrics
- Documentation of problems, issues, and concerns via Task Monitor Forms 18-15 or email

Physical Observation of Work Area 2.3.3

Periodic checks will be made, both with and without assistance of the Contracting Officer (CO) to ensure the following:

- The Contractor's workspace is physically separated from the Government's.
- The Contractor's workspaces are properly identified by signs with the company's name.
- All Contractor employees have their identification badges.
- The Contractor knows who the building's Facilities Operations Manager is and what his/her functions are.
- The Contractor is familiar with the building's emergency evacuation procedures.
- Contractor employees are aware that Work Area Searches may be conducted at any time.
- The Contractor has copies or access to copies of and is familiar with the content of the Goddard Announcements, NASA policy directives governing onsite performance, Goddard Procedural Requirements (GPRs) and Goddard Policy Directives (GPDs). GPRs and GPDs can be found at: http://gdms.gsfc,nasa.gov/gdmsnew/home.jsp),
- The Contractor is aware of the appropriate protection procedures for handling Government planning data and other confidential or financial Government data.

2.4 **Work Review and Performance Monitoring**

The Government will evaluate the Contractor's accomplishment of the technical objectives through the following:

- Monthly meetings with the Contractor to review progress and identify problems.
- Prepare/coordinate technical events for the Performance Evaluation Board meetings.
- Conduct inspection and acceptance of the Contractor's deliverable items.
- Review Contractor's safety procedures and performance.
- Assist/participate with the Safety and Health Office on their safety walkthroughs.

 Validate that Contractor is performing according to the required contractual plans (e.g. testing, integration, quality assurance, etc.) by physical inspection, review of submitted reports, and meetings with the Contract manager.

2.5 **Government Property Procedures**

- Review and approve Contractor's requests for acquisitions of supplies from Goddard's store stock.
- Conduct periodic inspection of equipment and its location and compare it to the data on the property records.
- Validate that no property or equipment are being acquired without the CO's prior approval.
- Review Contractor's request to purchase controlled property and equipment for onsite use and make recommendations to the COR and CO.
- Validate that the Contractor submits GSFC Form 20-4, Transfer/Shipping Request, to the CO and Code 273 to report when purchased equipment arrives onsite.
- Validate that all existing and new equipment is properly tagged.
- Validate that Government property is made available in accordance with the terms of the contract.
- Validate that the Contractor does not modify or provide additional equipment, plant equipment, or real property at Goddard, except as specifically required by the contract, or as directed or approved in writing by the CO.

2.6 **Personal Services Prevention**

- Prevent employer-employee relationships from occurring between Government and Contractor personnel by making sure that:
- Only the Contractor interviews prospective employees.
- Only the Contractor approves timecards and absences.
- Administrative prerogatives.

2.7 **Record Keeping and Documentation**

The Contracting Officer's Representative (COR) is responsible for maintaining accurate and complete records of the Contractor's performance. The COR is responsible for collecting the performance evaluation forms and maintaining any other material that reflects the quality of the Contractor performance. Even though the Contractor is responsible for ensuring performance compliance under their Quality Control requirements, the Government will give the Contractor

prompt notice of defects observed by the COR and technical monitors. This does not imply that the Government is obligated to carry out quality control inspections for the Contractor, but that on discovering a problem, the Government will inform the Contractor in detail of the incident. COR will keep CO informed of any issues brought to the attention of the Contractor by the COR.

If performance issues arise, they will be discussed immediately between the CO, COR, and Contractor. Action plans will be developed and resolutions tracked for closure by the Contractor and Government.

During the course of the contract, the COR shall retain a copy of all surveillance documentation. At the end of the surveillance period, these records shall be forwarded to the CO for inclusion in the contract file. However, when a specific service or task becomes unsatisfactory during a surveillance period, a copy of the documentation supporting the unsatisfactory performance shall be forwarded to the CO for action between the Government (CO and COR) and Contractor.

2.8 **Subjective Performance Evaluation Factors**

Cost - Task Orders are fulfilled within the established cost identified on the issued Task Order.

<u>Ingenuity and Innovation</u> - Contractor seeks and develops innovative solutions to requested task orders that result in savings of time, money, manpower, or improvements to performance.

<u>Subcontract Communication</u> - Contractor maintains effective communication within its own organization, including subcontractors. Problems, technical issues, and programmatic changes are promptly communicated to all concerned. Prime Contractor communication with subcontractors is seamless and transparent to the customer.

3.0 CRITERIA FOR EVALUATING PERFORMANCE

The Contractor's performance in all of the areas listed above will be monitored to assure that ineffective or wasteful methods are not being used. The COR will submit an annual report of the surveillance activities as part of the reports that are reviewed in the Performance Evaluation Meeting. In case of a finding that will require immediate attention the COR will notify the CO of the situation for necessary action. The Contractor will be required to submit a written response and any correcting action if needed.

4.0 RESPONSIBILITY

The COR has full responsibility for the oversight of day-to-day performance of requirements as required under task orders to be placed against this contract. The CO has full responsibility for

authorizing the task orders. The CO along with the COR will ensure compliance with the contract terms and conditions and work requirements for task orders are met.
Contracting Officer's Representative Signature
Contracting Officer Signature